

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

**LAURA WONDERCHECK,**

**Plaintiff,**

**v.**

**MAXIM HEALTHCARE SERVICES,  
INC.,**

**Defendant.**

**Civil Action No. 1:19-cv-00640-LY**

**DEFENDANT MAXIM HEALTHCARE SERVICES, INC.'S EXHIBIT LIST**

Pursuant to Local Rule CV-16(e)(4), Defendant Maxim Healthcare Services, Inc. submits its exhibit list. Maxim reserves the right to rely on any exhibit introduced by Plaintiff Laura Wondercheck or exhibits used for impeachment or refreshing recollection of witnesses.

Maxim expects to offer the following exhibits:

<b>Ex. No.</b>	<b>Bates No.</b>	<b>Description</b>	<b>Date Offered</b>	<b>Marked</b>	<b>Admitted</b>
D-1	WONDERCHECK000160-61	Wondercheck's résumé			
D-2	WONDERCHECK000162-64	IHSC Pharmacy Technician job description (pre-contract version)			
D-3	WONDERCHECK000215-18	Wondercheck's Maxim application			
D-4	WONDERCHECK000222-25	Maxim Pharmacy Technician job description			
D-5	WONDERCHECK000380	June 9, 2016 Integrity Hotline call report			

<b>Ex. No.</b>	<b>Bates No.</b>	<b>Description</b>	<b>Date Offered</b>	<b>Marked</b>	<b>Admitted</b>
D-6	WONDERCHECK000383-424	June 2016 Maxim Caregiver Employee Handbook			
D-7	WONDERCHECK000425-64	Maxim Code of Conduct			
D-8	WONDERCHECK000482	Wondercheck Employee Transcript			
D-9	WONDERCHECK000483-89	Wondercheck compliance training certificates			
D-10	WONDERCHECK000490	Wondercheck signed Handbook Acknowledgment			
D-11	WONDERCHECK000491	Wondercheck Code of Conduct certificate (June 21, 2015)			
D-12	WONDERCHECK000493	Wondercheck Code of Conduct certificate (May 24, 2016)			
D-13	WONDERCHECK000497-585	September 19, 2011 Maxim Deficit Reduction Act Policy Package			
D-14	WONDERCHECK000586	July 11, 2016 Wondercheck Corrective Action Form – Termination			

<b>Ex. No.</b>	<b>Bates No.</b>	<b>Description</b>	<b>Date Offered</b>	<b>Marked</b>	<b>Admitted</b>
D-15	WONDERCHECK000592-93	January 3, 2012 Maxim Anti-Retaliation, and Non-Intimidation (Whistleblower Protection) Policy			
D-16	WONDERCHECK000618-22	June 2016 email exchange with Maxim employees and Linda Applewhite			
D-17	WONDERCHECK000616-17	June 22, 2016 Wondercheck Corrective Action Form – Initial Warning			
D-18	WONDERCHECK000889-1120	Contract No. HSCEDM-15-C-00004 with Statement of Work and appendices			
D-19	WONDERCHECK000994-98	IHSC Pharmacy Technician job description (contract version)			
D-20	WONDERCHECK001243-60	ICE Health Service Corps LOP 00-42 with signature pages			
D-21	WONDERCHECK001275	July 11, 2016 Bradley Switter Corrective Action Form – Termination			

Ex. No.	Bates No.	Description	Date Offered	Marked	Admitted
D-22	WONDERCHECK001283-94	December 22, 2016 Settlement Agreement and Release by and between Maxim and the United States of America			
D-23	WONDERCHECK001295-96	June 21, 2016 letter terminating An Nguyen's contract with Maxim			
D-24	WONDERCHECK001299-1302	December 2016 email exchange with David Singer, Daniel Murphy, Nick Bradley, Brittany Tobias, Eric Wishner, and others regarding the costs associated with Nguyen's fraud (redacted)			
D-25	WONDERCHECK001303-04	McKesson Dilley Purchasing Detail Report/Invoice Detail Level			
D-26	Wondercheck000105-11, 308-27	Wondercheck Employee Data Report			
D-27	Wondercheck000252-258, 263-66	Wondercheck pay stubs from Brookshire Brothers			

<b>Ex. No.</b>	<b>Bates No.</b>	<b>Description</b>	<b>Date Offered</b>	<b>Marked</b>	<b>Admitted</b>
D-28	Wondercheck000259	June 2, 2017 Wondercheck Earnings Statement from Maxim			
D-29	Wondercheck000260-62	Wondercheck earnings statements from Target			
D-30	Wondercheck000330-34, 338	2015-2019 Wondercheck W- 2s			
D-31	Wondercheck000335-36	Wondercheck Employment Applications			

Maxim may offer the following exhibits:

<b>Ex. No.</b>	<b>Bates No.</b>	<b>Description</b>	<b>Date Offered</b>	<b>Marked</b>	<b>Admitted</b>
D-32		Plaintiff's Original Complaint			
D-33		Plaintiff's Answers and Objections to Defendant's First Set of Interrogatories			
D-34	WONDERCHECK000381	June 29, 2016 Integrity Hotline call report			
D-35	WONDERCHECK000382	July 2, 2016 Integrity Hotline call report			
D-36	WONDERCHECK000475-81	Wondercheck Pharmacy Technician Orientation and Annual Competencies			
D-37	WONDERCHECK000587-91	February 24, 2016 Maxim Corrective Action Policy			
D-38	WONDERCHECK000597-613	June 15, 2016 monthly staff meeting slide deck			
D-39	WONDERCHECK000657-	February 25, 2016 Final Exam General Compliance			
D-40	WONDERCHECK000660-63	2016 Annual General Compliance and Ethics Training Course Outline			
D-41	WONDERCHECK000664-90	2016 Annual General Compliance and Ethics Training Script			

<b>Ex. No.</b>	<b>Bates No.</b>	<b>Description</b>	<b>Date Offered</b>	<b>Marked</b>	<b>Admitted</b>
D-42	WONDERCHECK000691-94	2016 Clinical Compliance Staffing – Course Outline			
D-43	WONDERCHECK000695-883	Online Clinical Compliance curriculum scripts			
D-44	WONDERCHECK001155-87	2016 Maxim Facility Guidelines and Orientation Manual			
D-45	WONDERCHECK001188-90	2015 Clinical Compliance Staffing Skilled Training Course Outline			
D-46	WONDERCHECK001191-1238	2015 New Hire/Rehire General Compliance and Ethics Training			
D-47	WONDERCHECK001239-42	2015 Annual General Compliance and Ethics Training Course Outline			
D-48	WONDERCHECK001261-64	June 20, 2016 email from Jeff DeCarlo to Shawn Coffin attaching McKesson invoices			
D-49	WONDERCHECK001265-66	June 30, 2016 TSBP Online Complaint regarding Nguyen			
D-50	WONDERCHECK001267-68	July 11, 2016 TSBP Online Complaint regarding Wondercheck			

<b>Ex. No.</b>	<b>Bates No.</b>	<b>Description</b>	<b>Date Offered</b>	<b>Marked</b>	<b>Admitted</b>
D-51	WONDERCHECK001269-70	July 11, 2016 TSBP Online Complaint regarding Switter			
D-52	WONDERCHECK001271-74	July 13, 2016 email exchange with Coffin and Thomas Hochberg regarding Nguyen			
D-53	WONDERCHECK001276-79	June 21, 2016 email exchange with Murphy, Coffin, Kristin Stemple, Thomas Gillespie, and Jenny Moon regarding Nguyen termination and suspension			
D-54	WONDERCHECK001280-82	July 2016 email exchange with Murphy, Jawn Oilar, Gillespie, and Coffin regarding Switter's and Wondercheck's terminations			
D-55	Wondercheck000289-307	Wondercheck earnings statements from Maxim			
D-56	Wondercheck001028	Maxim Federal contracts in force as of July 2016 (redacted)			



Dated: November 6, 2020

Respectfully submitted,

*/s/ Lindsay A. Hedrick*

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*Attorneys for Defendant Maxim Healthcare  
Services, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on November 6, 2020, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which will send electronic notice to all counsel of record.

*/s/ Lindsay A. Hedrick*

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Lindsay A. Hedrick